

# **EXHIBIT 1**

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**DECLARATION OF GUY L. WATTS**

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3 Guy L. Watts declares the following pursuant to 28 U.S.C. § 1746:

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5 1. I am an individual over 18 years of age and competent to make this Declaration.

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7 2. I am an attorney with the law firm of Watts Guerra LLP, attorneys of record for  
thousands of victims of the fires started by PG&E in 2017 (the twenty fires generally referred to as  
the “North Bay”), 2018 (“Camp Fire”) and 2019 (“Kincade Fire”).

8 3. If called upon to do so, I could and would competently testify as to the facts set  
forth in this Declaration.

9 4. The facts set forth below are true of my personal knowledge.

10 5. I make this Declaration in support of the motion to allow late filing of proofs of  
claim (“Motion”) on behalf of Eileen King and Jason King (“Movants”), who lost their property in  
the CAMP Fire.

11 6. The clients did not have a claim filed before the December 31, 2019 claims bar date  
due to excusable neglect and should be allowed to file a proof of claim after the bar date.

12 7. On October 3, 2019, Eileen King contacted our Chico office inquiring about the  
process to submit a claim. The representative confirmed via email on October 3, 2019 the process  
for Mrs. King to access and sign a contract to move forward as a client. The representative included  
in her email the Court ordered CMO5 form for competition as well. On October 4, 2019, Mrs.  
King returned the completed CMO5s requesting a return call as she still had open questions.  
Neither Mrs. King nor the representative followed up the October 4, 2019 email exchange. On  
April 30, 2020, Mrs. King emailed the same representative inquiring about follow up to her email  
of October 4, 2019. After a review of all emails, a search of all databases, conversations with Mrs.  
King, it was determined that both the representative and Mrs. King had failed to follow thru on the  
last email exchange with Mrs. King thinking the CMO5 was sufficient to move her claim forward.

1 Mrs. King recalls the contract and signing but apparently due to failed issues with either the website  
2 or user error, the signed documents were never received by Watts Guerra LLP.

3           8. On June 10, 2020, Watts Guerra LLP filed claim numbers BYRVK27402  
4 and TZXST27402 on behalf of Movants (“Subject Proofs of Claims”). True and correct copies of  
5 the Subject Proofs of Claim are collectively attached to the Guy L. Watts Declaration as Exhibit  
6 “A”.

7           I declare under penalty of perjury under the laws of the State of California that the forgoing  
8 is true and correct and executed this 10<sup>th</sup> day of June 2020.

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10                          */s/ Guy L. Watts*  
11                          Guy L. Watts